

M
S
EMcGillivary
Steele
Elkin LLP

April 30, 2025

USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC #: _____
DATE FILED: 05/01/2025

Via ECF

The Honorable Katherine H. Parker
 Daniel Patrick Moynihan
 United States Courthouse
 500 Pearl St.
 New York, NY 10007

MEMO ENDORSEDRe: *Conklin, et al. v. United States Postal Service*, No. 1:23-cv-07122 (SHS) (KHP)

Dear Judge Parker:

I represent the Plaintiffs in the above-captioned matter, and I write with Defendant's consent to respectfully request a brief adjournment of the settlement conference currently scheduled for May 22, 2025, to June 11, 12, or 13, 2025, or to the next available date after June 23, 2025, along with a concomitant adjournment of the deadline for pre-conference submissions. The reason for this request is that the first named plaintiff and member of the Plaintiffs' settlement team, Tad Conklin, is a member of the U.S. Navy Reserve and will be performing naval duties on May 22, 2025, and has been unable to adjust his schedule to allow him to attend the settlement conference.

This is Plaintiffs' first request for an adjournment of the settlement conference, and the third such request in this litigation. By Order dated November 12, 2024, the Court scheduled a settlement conference for February 18, 2025, with pre-conference submissions due no later than February 11, 2025. *See ECF No. 53.* Upon the Government's request—with Plaintiffs' consent—the Court issued an Order on February 5, 2024, adjourning the settlement conference to April 22, 2025, with pre-conference submissions due by April 15, 2025. *See ECF No. 65.* Subsequently, on April 10, 2025, the Government—also with Plaintiffs' consent—requested a brief adjournment of the April 22 conference and its associated pre-conference submission date. *See ECF No. 66.* The Court issued an Order on April 10, 2025, adjourning the settlement conference to May 22, 2025, with pre-conference submissions due on May 15, 2025. *See ECF No. 67.*

I thank the Court for its consideration of this request.

Sincerely,

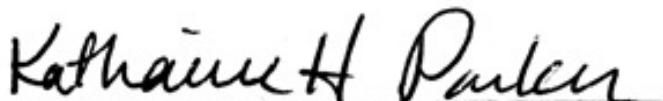
McGILLIVARY STEELE ELKIN LLP

/s/ John W. Stewart
 John W. Stewart

cc: All Counsel of Record (via ECF)

APPLICATION GRANTED: The settlement conference in this matter scheduled for to Thursday, May 22, 2025 at 2:00 p.m. in Courtroom 17-D, United States Courthouse, 500 Pearl Street, New York, New York is hereby rescheduled Thursday, June 26, 2025 at 2:00 p.m. Parties must attend inperson with their counsel. Corporate parties must send the person with decisionmaking authority to settle the matter to the conference. The parties are instructed to complete the Settlement Conference Summary Report and prepare pre-conference submissions in accordance with the Judge Parker's Individual Rules of Practice. Pre-conference submissions must be received by the Court no later than June 20, 2025 by 5:00 p.m.

APPLICATION GRANTED



Hon. Katharine H. Parker, U.S.M.J.

05/01/2025